Coal Dust

Current Status in NR 445 Proposal
and Alternate NR 415 Proposal

Current NR 445 Proposal

- List coal dust with ambient air quality standard
- Include compliance options in addition to dispersion modeling
  - site specific ambient monitoring
  - sector ambient monitoring
  - variance option
- Continue dialogue with stakeholders

NR 415 Considerations

- Staff analysis of NR 415 concluded that it does not provide regulatory framework for adequate protection
  - Does not set emission standards or minimum performance requirements
- Public comments on proposed NR 445 :
  - Concerns with implementation of compliance options
  - Several suggestions to consider revising NR 415 to specifically address coal dust emissions

Today's Meeting

- Present a proposal for a coal dust section in NR 415
- Discuss the proposal with you
- Get feedback on whether to pursue this approach

Main Items in Proposal

- Creates New Section in NR 415, specifically addressing coal/solid fossil fuel handling, storage, transportation facilities
- Establishes Visible Emissions (VE) requirements at property line and at process level.
- Uses EPA Method 22, and allows up to 3 minutes of visible emissions in each hour
- Requires complete enclosure if source is within 100 meters of a residence
- Best management practices are proposed by sources and are placed in a particulate matter control plan
- Requires ability to apply dust suppressants daily

Main Items in Proposal (Cont'd)

- Visible Emissions at the property boundary and at each source of emissions are to be made: twice per day at facilities handling >200,000 tons/yr; once per day at facilities handling <200,000 tons/yr
- Baghouse efficiency is specified in order to reduce emissions of particulate matter to a level that is achievable.
- Training requirements for facility personnel are specified.
- Compliance Dates: New/Modified = upon startup; Existing = within 12 months
- Certification process until requirements placed into permits
- Recordkeeping requirements are included

Particulate Control Plan

- Identify a responsible person to implement and give personnel authority to act when necessary
- Facilities have wide latitude to specify what controls to use, when, and how much, but specifics will be in the plan
- Freezing weather operating scenarios will be developed
- High wind operating scenarios will be developed
- Procedures in the event of equipment malfunction will be developed
- Failure to implement the plan will be a violation

Non- Enclosed Sources

- All sources shall be equipped with, and use, as needed, water sprays, dust suppressant/chemical treatment - capability must be daily
- 100% coverage of storage piles is required
- Water/suppressants must be applied in a manner that does not cause pollution of waters of the state

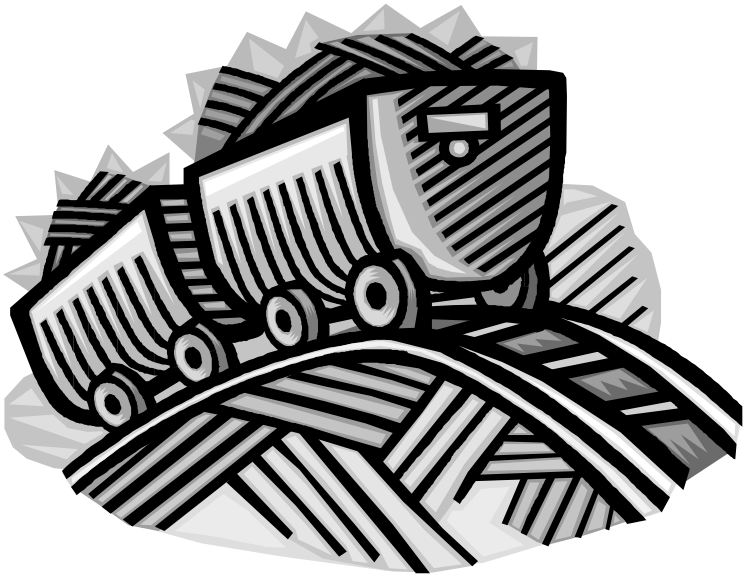
Enclosed Sources

- Enclosed sources, such as enclosed conveyors and buildings that house dusty operations shall either have water/suppressant spray bars or have permitted air pollution control equipment (such as baghouses) to control particulate matter emissions at designed vents, stacks,etc.
- Baghouse efficiency shall not be less than 99.9% for PM10
- Entrances and exits to enclosed buildings shall have overlapping flaps, sliding doors or other devices to reduce the release of fugitive particulate matter into the atmosphere

Training

- All personnel that can create PM emissions as well as those that maintain equipment that affects PM emissions shall receive training
- Initial training before any work that can adversely affect emissions & annually thereafter
- The training will emphasize that individuals have a role in preventing excessive emissions and facility takes their obligations seriously
- That failure to stop any coal operations (unless emergency) when excessive emissions are occurring, is a violation
- Training includes what actions employees must take when excessive emissions occur

Method 22 Visible Emissions



- Approved EPA Test Method
- Method used in NR 415 for rock ledge quarries and sand mines
- Used by EPA for Municipal Waste Combustors, landfill flares, etc.
- Uses a trained observer, not a piece of test equipment
- Trained observer needs to attend lecture portion of Method 9 training, but does not have to be certified in "smoke school" to read opacity
- Two stopwatches are used
- One keeps track of total time
- Other one tracks total time visible emissions are seen during that time period